



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

December 6, 2021

By ECF

The Honorable Valerie Caproni
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Natural Resources Defense Council v. Regan*, No. 21 Civ. 461 (VEC) (S.D.N.Y.)

Dear Judge Caproni:

This Office represents the defendants, the United States Environmental Protection Agency, and its Administrator, Michael S. Regan, in his official capacity (together, the “EPA”), in this action. I write, jointly with counsel for plaintiff, to respectfully request that the Court enter the accompanying proposed consent decree to resolve this matter.

As detailed in prior letters, EPA provided an opportunity for public comment on the proposed consent decree. Notice of the proposed consent decree was published in the Federal Register in October. *See* Proposed Consent Decree, Safe Drinking Water Act Claims, 86 Fed. Reg. 59383 (Oct. 27, 2021). That notice and comment process is now complete, and no comments were received on the proposed consent decree.

Accordingly, the parties jointly request that the Court enter the proposed consent decree, which we will file on the docket as a proposed order after docketing this letter.

We thank the Court for its attention to this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

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